

FILED

MAR 15 2023

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

JUDGE HARRY D. LEINENWEBER  
U.S. DISTRICT COURT JUDGE

UNITED STATES OF AMERICA,

)

v.

)

Case No. 20 CR 812

MICHAEL MCCLAIN, ANNE  
PRAMAGGIORE, JOHN HOOKER,  
and JAY DOHERTY

)

Hon. Judge Harry D. Leinenweber

)

)

TRIBUNE PUBLISHING COMPANY'S MOTION TO JOIN CHICAGO PUBLIC  
MEDIA, INC.'S AND CHICAGO SUN-TIMES MEDIA, INC.'S EMERGENCY MOTION  
FOR LEAVE TO INTERVENE AND FOR IMMEDIATE  
ACCESS TO EXAMINE AND COPY AUDIO RECORDINGS  
AS THEY ARE OFFERED INTO EVIDENCE

Tribune Publishing Company ("Chicago Tribune"), by their counsel, moves to join the motion of Chicago Public Media, Inc. ("WBEZ") and Chicago Sun-Times Media, Inc. ("Sun-Times") for leave to intervene in this matter for the limited purpose of objecting to the denial of access and copying of recordings introduced into evidence in this case (the "Access Motion"), and to file its appearance, and in support states:

On March 14, 2023, counsel for WBEZ and the Sun-Times appeared before the Court for hearing on the Access Motion. At that time, counsel stated that he was also appearing on behalf of the Chicago Tribune, which wished to join the Access Motion. After hearing argument and having reviewed the papers submitted by WBEZ and the Sun-Times, the Court granted the Access Motion.

Pursuant to Federal Rule of Civil Procedure 20, the Chicago Tribune requests that Court formally grant its motion to join the Access Motion *nunc pro tunc* and enter its appearance so that the record in this matter is clear on that point. Permitting the Chicago Tribune to formally

join the Access Motion and enter its appearance in this matter will not affect the proceedings, require any further hearing regarding the Access Motion, or result in prejudice to any party.

WHEREFORE, Tribune Publishing Company respectfully requests that the Court permit it to join the Access Motion pursuant to Federal Rule of Civil Procedure 20 and enter its appearance as an intervenor.

Respectfully submitted,

March 15, 2023

TRIBUNE PUBLISHING COMPANY

/s/ Brian D. Saucier  
One of its attorneys

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